Cheltenham Plan Examination

Matter 2: Economic Development

Written statement by Cheltenham Borough Council

23rd January 2019

Matter 2: Economic Development

Main Issue: Do the employment policies of the CP deliver Policy SD1 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS)?

1. The JCS Policy SP1 sets a provision of a minimum of 192ha of B-class employment land for the JCS area. The strategic allocations will provide for some 84ha. How has Cheltenham Borough Council (CBC) calculated the appropriate level of employment allocations to provide within the CP?

Cheltenham Borough Council recognises the importance of delivering sufficient employment land to allow businesses to grow, relocate and thrive. The methodology used in the JCS identified a JCS-wide employment land requirement; the way in which the figure of 192ha was derived meant that it was not possible for the JCS to identify individual targets for each of the JCS authorities. However, in the JCS Inspector's final report it was stated that Cheltenham Borough has a capacity of 1ha of employment land. This along with the identified capacities for Gloucester City and Tewkesbury Borough Council's would achieve the remaining requirement when having taken account of the identified existing capacity of 63ha and the employment land being delivered by the Strategic Allocations.

The Cheltenham Plan allocates 8.28ha of land for employment uses over four sites. The sites identified in policy EM3 of the Cheltenham Plan were identified as being key sites on which employment land could be delivered. Sites allocated in the Cheltenham Plan were first assessed through the Strategic Assessment of Land Availability (SALA) (document reference EB020), which is a high level first assessment of site suitability, availability and achievability for different land uses/ development. At the time of writing the Pre-Submission version of the Cheltenham Plan, these were the only four sites found to be suitable, available and achievable for employment uses that had been made known to the Council.

2. Are Policies EM1 and EM2 in accordance with NPPF paragraph 22?

The Council considers Policies EM1 and EM2 to be in accordance with paragraph 22 of the NPPF, taking account of the following reasons. Cheltenham Borough is constrained by the Green Belt to North and West and the Cotswolds AONB to the South and East, which makes land within the Borough a finite resource. Over the years there has been a trend of ongoing loss of B1 employment sites in Cheltenham and increasing need. This loss could be due to a number of factors, including permitted development rights. With these factors taken into account the Council understand that it is important to use land effectively. The strategy used to define policies EM1 and EM2 of the Cheltenham Plan aimed to maintain the best and most versatile of employment land for that use. As explained in more detail in the Economy Background Paper the key characteristics sought in a key employment site include:

- Location of the site both strategically and considering local accessibility;
- Access via public and sustainable modes of travel;
- Proximity to community facilities;
- The size of the site and capacity for future expansion;
- Other supply of such premises, if supply is limited;
- Market demand for such sites;
- Lack of other physical constraints.

Therefore it is felt that Policy EM1 is compliant with paragraph 22 of the NPPF.

Policy EM2 has been written in such a way as to be protective of good employment land, but also being flexible. This is in recognition of the loss of employment land, as mentioned above, and of paragraph 22 of the NPPF. The policy has been written to allow changes of use to other uses that exhibit employment characteristics, and the use of a sequential approach to other proposed changes supports the approach taken in policy EM1, by maintaining the best and most versatile employment land, whilst land that is not needed can be re-developed.

Furthermore it is recognised in the Economy Background Paper (document number NS004 in the Non-submitted supporting documents section of the Examination Library), that the term "employment" now covers more than the traditional B1, B2 and B8 use classes. In paragraph 3.26 it is stated that "uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care can also be large employment providers".

In line with the new requirement in the NPPF, 2018 to review Local Plans every five years, both of these policies will be monitored during the first five years of the plan from adoption and if necessary reconsidered at plan review, to avoid land being left un-used in the long-term.

3. Are all the sites allocated in the CP (Policy EM3) suitable and available for delivery as employment sites?

All of the sites allocated in the Cheltenham Plan have been assessed through the Strategic Assessment of Land Availability (SALA). The methodology used for the SALA considers a site's suitability, availability and achievability at a high level. If a site is not considered suitable or available through the SALA, then it would not have been considered for allocation in the Cheltenham Plan.

The methodology used in the SALA can be found in document reference EB020 of the Evidence Base section of the Examination Library.

Furthermore, all of the sites allocated in the plan are the subject of current or recent planning applications for employment uses. This demonstrates that the sites are available for development and that there is an appetite to see them developed for this use.

For the above reasons all the sites allocated in Policy EM3 are considered suitable and available for employment land development.

4. Does the CP provide adequate support for the expansion of existing small/medium sized businesses and provide opportunities for new business start-ups through Policy EM6?

When Policy EM6 is read in conjunction with the Joint Core Strategy (JCS) *Policy SD1: Employment-except retail development* matters relating to developments for small/medium sized businesses and business start-ups are given a clear steer for decision makers. The relevant policy in the JCS states that "Employment-related development will be supported: Where it allows the growth or expansion of existing business especially in the key growth sectors, subject to all other policies of the plan; and Where it would encourage and support the development of small and medium sized enterprises, subject to all other policies of the plan". Through both the JCS and the Cheltenham Plan, the Council recognise the important contribution small/medium sized businesses can make to the economy and the importance of encouraging growth and development in those businesses, as well as support for new businesses. The Council is working to produce an Economic Growth Delivery Plan; within this document further actions will be identified to support the policies in the JCS and the Cheltenham Plan.

Furthermore, a Statement of Common Ground between Cheltenham Borough Council and the GFirst LEP Construction and Infrastructure Group, states that the two parties will work closely together to agree changes to the wording of Policy EM6 in order to provide greater clarity on how the Council will work with landlords and tenants to achieve the policy.

5. Should any further provision be made for economic development which falls outside B-class uses?

The Council considers that the policies contained within the Cheltenham Plan will complement other strategies adopted or currently being produced by the Council, including a tourism strategy and an economic development action plan. Furthermore with the degree of flexibility built into the policies both through a wider meaning of the term "employment land" and through the policies themselves, it is felt that further policies are not required of this kind.

Furthermore, it should also be considered that through the JCS Retail Review, as explained in paragraph 7.1.13, policies to support the retail sector will be created, this could include allocations where relevant and required for future retail growth.